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**ATTACHMENT A**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Frank H. Figgers, III, Task Force Officer, United States Postal Inspection Service, having been duly sworn under oath, state as follows:

1. Your affiant is a certified police officer employed full time with the Virginia State Police and holds the rank of Special Agent. I am currently assigned as a Task Force Officer with the United States Postal Inspection Service (“USPIS”) assigned in the Roanoke, Virginia Domicile. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector. I have been employed as a sworn officer with the Virginia State Police since January 1989 and have worked the drug interdiction arena with the Virginia State Police since 2003. My work has included highway drug interdiction and parcel interdiction at other commercial parcel businesses. I have received formal training in conducting criminal investigations into drug trafficking and money laundering organizations that utilize the United States Postal Service (“USPS”). During my tenure as a Special Agent, I have conducted and participated in numerous investigations of criminal activity that have violated both federal and state law.

2. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of controlled substances. I know based on training and experience that USPS Priority Mail and

Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

3. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail parcel bearing tracking number “9505 5154 6267 2228 7156 84” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Mr. Timmy Johnson, 1517 Abbott Street, Roanoke, VA 24017
- b. Return Address: Patrick Williams, 646 ½ 62<sup>nd</sup> Street, San Diego, CA 92114
- c. Postage Affixed: Origin: San Diego, CA, Postage: \$31.25, Date: AUG 16, 2022
- d. Tracking Number: 9505 5154 6267 2228 7156 84 (Parcel #1)
- e. Description: Brown cardboard box bearing dimensions 12.25” x 8.25” x 8.5”
- f. Weight: 5 pounds 5.30 ounces

5. On August 18, 2022, your affiant took custody of Parcel #1. Parcel #1 was mailed from San Diego, CA to Roanoke, VA. California is a known source area for parcels containing controlled substances mailed into the Western District of Virginia. Parcel #1 is a brown cardboard box bearing a USPS Priority Mail postage paid label and a handwritten return address of 646 ½ 62nd Street, San Diego, CA 92114. Parcel #1 was mailed from the Encanto Station Post Office located in San Diego, CA and postage paid in cash. The recipient is listed as Mr. Timmy Johnson, 1517 Abbott Street, Roanoke, VA 24017 on the handwritten label. A photograph of Parcel #1 is attached as Exhibit #1.

6. A search of postal business records revealed three (3) previous parcels mailed from San Diego, CA to the destination address of 1517 Abbott Street NW, Roanoke, VA 24017. These

previous parcels ranged in weight from five (5) to (6.9) pounds and were mailed between September 11, 2021 and July 21, 2022. A search of postal business records did not reveal any previous parcels being mailed to 646 ½ 62<sup>nd</sup> Street, San Diego, CA from the Roanoke, VA area.

7. I utilized CLEAR to conduct searches for information related to Parcel #1. Your affiant was able to determine through CLEAR that a L.W. resides at 646 ½ 62<sup>nd</sup> Street, San Diego, CA 92114 as recently as March 2022. CLEAR reports a “Patrick Williams” residing at 525 11<sup>th</sup> Avenue Unit 1312, San Diego, CA 92101 as recently as June 30, 2022. The address of “525 11<sup>th</sup> Avenue Unit 1312” is approximately 6.8 miles from the “646 ½ 62<sup>nd</sup> Street” address. A CLEAR Search of the shipper’s name “Patrick Williams,” could not be associated with 646 ½ 62<sup>nd</sup> Street, San Diego, CA 92114. A CLEAR search for the recipient’s name, “Mr. Timmy Johnson,” was not able to be associated to destination address 1517 Abbott Street NW, Roanoke, VA 24017. Based on your affiant’s training and experience, this type of mailing pattern from a fictitious shipping address or fictitious name can be indicative of drug trafficking through the U.S. Mail.

8. On August 18, 2022, your affiant requested a narcotic detection canine from the Virginia State Police. Trooper T.W. Fridley, and his narcotic detection canine, “BOSS,” responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Avenue NE, Roanoke, Virginia 24022. Parcel #1 was placed in a blind parcel line-up and subjected to an exterior search by Canine “BOSS.” Trooper Fridley advised your affiant at approximately 11:45 a.m. that Canine “BOSS” alerted to Parcel #1. According to Trooper Fridley, this positive alert meant Canine “Boss” detected the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Trooper Fridley and Canine “BOSS” is provided as Exhibit #2.

9. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail Express parcel bearing tracking number “9505 5154 6267 2228 7156 84,” addressed to “Mr. Timmy Johnson, 1517 Abbott Street NW, Roanoke, VA 24017” bearing a return address of “Patrick Williams, 646 ½ 62<sup>nd</sup> Street, San Diego, CA 92114,” contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Frank H. Figgers, III  
Frank H. Figgers, III  
Task Force Officer, USPIS

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 18th day of August, 2022.

Robert S. Ballou  
The Honorable Robert S. Ballou  
United States Magistrate Judge  
Western District of Virginia